NO. 95024-5

SUPREME COURT OF THE STATE OF WASHINGTON

CHRISTAL FIELDS,

Appellant,

v.

WASHINGTON STATE DEPARTMENT OF EARLY LEARNING,

Respondent.

SUPPLEMENTAL BRIEF OF THE WASHINGTON STATE DEPARTMENT OF EARLY LEARNING

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I. INTRODUCTION

Ensuring that children in child care are safe and secure means that some individuals with adverse events in their backgrounds cannot work in child care, even if their goal is to do good. As a matter of public policy, the Legislature states that the "health, safety, and well-being of children receiving child care . . . is paramount over the right of any person to provide care." RCW 43.215.005(4)(c). In this case, appellant Christal Fields was disqualified from child care work because a statutorily mandated criminal background check found that she had been convicted of a crime that permanently disqualifies her under WAC 170-06-0120(1).

Ms. Fields challenges her disqualification by arguing that a permanent disqualification from child care work because of a criminal conviction is not rationally related to the safety and well-being of children in child care and therefore violates substantive due process. Alternatively, she concedes some criminal convictions might be related to the safety of children, but contends her conviction does not. Then, in a claim that essentially repeats her substantive argument against any use of disqualifying crimes, she argues that as a matter of procedural due process she should have been able to show why she should not be disqualified.

All of Ms. Fields' arguments fail. The challenged regulation, WAC 170-06-0120(1), is rationally related to the legitimate public interest

in ensuring the safety and well-being of children in child care. The regulation therefore withstands rational basis review and does not violate substantive due process. Ms. Fields' procedural due process claim is without merit, and no other constitutional claim has been properly raised on appeal. This Court should affirm the decision of the Court of Appeals.

II. STATEMENT OF THE CASE

The law requires a criminal background check of any person in Washington who seeks to work with or have unsupervised access to children in child care. RCW 43.215.215; WAC 170-06-0040, -0041. When Ms. Fields sought to work in child care in 2013, she submitted the required application for a background check to the Department of Early Learning. CP 7, 12. In the application, and in five subsequent communications with the Department, she did not disclose either her 1988 conviction for Attempted Robbery 2 or the fact that she had nearly three dozen felony and misdemeanor convictions between 1985 and 2006. CP 7-8, 69-110. In November 2014, the Department issued a notice to Ms. Fields that she was permanently disqualified from unsupervised access to children in child care because her "extensive criminal history and untruthfulness" demonstrated that she lacked "the character and suitability to be unsupervised with children in child care facilities licensed or certified by the Department of Early Learning." CP 7-9.

Ms. Fields administratively appealed her disqualification, initially claiming that the criminal history the Department cited was not hers and that she had no disqualifying criminal convictions. CP 53-54. Because her conviction for Attempted Robbery 2 by itself was enough to support the permanent disqualification under WAC 170-06-0070(1) and -0120(1), the Department moved for summary judgment. CP 139-152. At that point, Ms. Fields did not contest the Attempted Robbery 2 conviction, but argued that she had turned her life around and had become "the poster child for redemption and second chances."[1] CP 131. Finding no disputed issues of material fact and concluding that Ms. Fields was subject to permanent disqualification under the controlling administrative rules, the administrative law judge granted the Department's motion for summary judgment. CP 155-164. The initial order was affirmed by a review judge. CP 186-192.

Both the King County Superior Court and the Court of Appeals upheld the decision of the review judge. CP 310-11 (superior court order); *Fields v. State of Wash. Dep't of Early Learning*, No. 75406-8-I (Wash. Ct. App. Aug. 21, 2017) (unpublished).[2] Both courts rejected Ms. Fields'

[1] The Department does not intend to trivialize the effort Ms. Fields has undertaken to reform her life. But her claim of reformation must be reviewed in light of her untruthfulness in communications with the Department in 2013.

[2] A copy of the slip opinion is attached to Ms. Fields' Petition for Review.

arguments that the controlling administrative rules violate her substantive and procedural due process rights. CP 310-311; *Fields*, slip op. at 4-16.

III. ISSUES ON REVIEW

In the superior court and in the Court of Appeals, Ms. Fields challenged the constitutionality of the disqualification rule, articulating two assignments of error (Opening Brief of Appellant Christal Fields at 2-3), which may be fairly paraphrased as follows:

1. Does the Department's rule disqualifying a person from working in child care if they committed any of the enumerated crimes violate substantive due process where the rule was adopted to ensure the safety and welfare of children in child care?

2. Did the Department violate procedural due process by providing Ms. Fields with notice and an opportunity to contest her disqualification from working in child care because of her criminal history, but not to avoid disqualification based on evidence intended to show that she has been rehabilitated following a disqualifying crime?

These are the only constitutional issues properly before this Court.

IV. ARGUMENT

In challenging her disqualification, Ms. Fields argues primarily that WAC 170-06-0120(1) facially violates substantive due process by

permanently disqualifying an applicant from working with children in child care based on criminal history without considering the applicant's individual circumstances. Pet. at 5-10. Her claim fails because no fundamental liberty interest is at issue and the regulation is rationally related to the legitimate public interest in ensuring the safety and welfare of children in child care.

She also argues that she should have been given a hearing to prove she can safely work in child care notwithstanding her criminal history. Pet. at 10-11. She claims a violation of procedural due process, but her arguments again focus on the substance of the disqualification regulation. She was not deprived of either procedural or substantive due process.

A. Ms. Fields Has Not Demonstrated a Facial Violation of Substantive Due Process

1. Standard of review

To demonstrate a facial violation of due process, Ms. Fields must show that there is no set of circumstances under which the regulation could be constitutionally applied. *City of Pasco v. Shaw*, 161 Wn.2d 450, 458, 166 P.3d 1157 (2007); *City of Redmond v. Moore*, 151 Wn.2d 664, 668-69, 91 P.3d 875 (2004) (same); *see also Wash. State Grange v. Wash. State Republican Party*, 552 U.S. 442, 449, 128 S. Ct. 1184, 170 L. Ed. 2d 151 (2008) (same). Review is de novo. *Pasco*, 161 Wn.2d at 458; *Redmond*, 151 Wn.2d at 668. The regulation is presumed constitutional

and Ms. Fields bears the heavy burden of proving the regulation's unconstitutionality beyond a reasonable doubt. *Knudsen v. Wash. State Exec. Ethics Bd.*, 156 Wn. App. 852, 860, 235 P.3d 835 (2010); *Wash. Cedar & Supply Co., Inc. v. Dep't of Labor & Indus.*, 137 Wn. App. 592, 604, 154 P.3d 287 (2007); *Longview Fibre Co. v. Dep't of Ecology*, 89 Wn. App. 627, 632-33, 949 P.2d 851 (1998).

2. Because Ms. Fields' interest in employment in child care is not a fundamental interest, the challenged rules are subject only to rational basis review

In a substantive due process challenge, the level of review depends on the nature of the right involved. *Amunrud v. Bd. of Appeals*, 158 Wn.2d 208, 219, 143 P.3d 571 (2006). The Department acknowledges that Ms. Fields has a liberty interest in pursuing an occupation of her choice. But Ms. Fields has effectively conceded, as she must, that her occupational interest does not rise to the level of a fundamental right. Pet. at 7. "[N]either this court nor the United States Supreme Court has characterized the right to pursue a particular profession as a fundamental right." *Amunrud*, 158 Wn.2d at 220. *See also Conn v. Gabbert*, 526 U.S. 286, 291-292, 119 S. Ct. 1292, 143 L. Ed. 2d 399 (1999) (quoting *Amunrud*, 158 Wn.2d at 220 ("[T]he liberty component of the Fourteenth Amendment's Due Process Clause includes some generalized due process right to choose one's field of

private employment, but a right which is nevertheless subject to reasonable government regulation.")).

Like the appellant in *Amunrud*, Ms. Fields has relied almost exclusively on the U.S. Constitution for her claims. *See Fields*, slip op. at 5-6. In no case does the Supreme Court hold that there is a liberty interest in engaging in an occupation without reasonable regulation. Instead, the rational basis test is consistently applied to regulations impacting the right to choose a profession or operate a business, confirming that such interests are not fundamental rights for constitutional purposes. *See*, *e.g.*, *Mass. Bd. of Ret. v. Murgia*, 427 U.S. 307, 313-14, 96 S. Ct. 2562, 49 L. Ed. 2d 520 (1976) (applying rational basis review to a statute imposing mandatory retirement ages on police officers and holding there is no fundamental right to government employment); *Schware v. Bd. of Bar Examiners of N.M.*, 353 U.S. 232, 238, 77 S. Ct. 752, 1 L. Ed. 2d 796 (1957) (confirming there is no fundamental right to practice law).

As noted above, Ms. Fields' substantive due process arguments are rooted in the federal constitution, and she has not argued for a separate and independent substantive due process analysis under the Washington Constitution or given any reason to interpret them differently in this case. Nevertheless, she continues to argue that the Court should depart from well-establish state and federal precedent defining the limits of rational

basis review and instead apply the heightened standard used in *Peake v. Pennsylvania*, 132 A.3d 506 (Pa. Commw. Ct. 2015). Pet. at 6. The Pennsylvania court agreed that the right of individuals to engage in a particular occupation is not a fundamental right that implicates strict scrutiny, and that rational basis review therefore should be applied in a due process challenge. *Peake*, 132 A.3d at 518. However, "[d]ue process challenges under the Pennsylvania Constitution are analyzed 'more closely' under the rational basis test than due process challenges under the United States Constitution." *Id.* As the Court of Appeals correctly observed in declining to apply *Peake*, Ms. Fields' due process arguments are rooted solely in the United States Constitution, not the Pennsylvania Constitution. *Fields*, slip op. at 11-12. The heightened standard applied in *Peake* has no applicability to a challenge brought under the federal constitution.

Moreover, when the Wisconsin Supreme Court applied normal rational basis review in a substantive due process challenge brought under the federal constitution, it upheld the constitutionality of a disqualifying law similar to WAC 170-06-0120(1). *Blake v. Jossart*, 370 Wis.2d 1, 884 N.W.2d 484 (2016), *cert. denied*, 137 S. Ct. 669 (Jan. 9, 2017) (holding that a lifetime ban on child care licensure because of conviction for welfare fraud did not violate substantive due process as applied to

Ms. Blake). Like the Wisconsin Supreme Court, this Court should apply normal rational basis review to Ms. Fields' due process claim.

3. Ms. Fields has not met her burden under rational basis review

Rational basis review is "the most relaxed form of judicial scrutiny," and is satisfied wherever there is (1) a legitimate state interest and (2) a rational connection between the interest and the means by which that interest is pursued. *Amunrud*, 158 Wn.2d at 222-23. The legitimate state interest served in this case is the health, safety, and well-being of children in child care, and that interest "is paramount over the right of any person to provide care." RCW 43.215.005(4)(c). Neither Ms. Fields nor any amicus curiae contests the legitimacy of this interest. To ensure children's safety, every prospective employee who may have unsupervised access to children in child care must undergo a criminal background check. RCW 43.215.215(2); RCW 43.43.832(4) (directing the Department to adopt rules to implement criminal background checks).

The burden is on Ms. Fields to show that there is no rational relationship between the challenged rule and a legitimate state interest. *Amunrud*, 158 Wn.2d at 220-22. That is a difficult burden because "a court may assume the existence of any necessary state of facts which it can reasonably conceive in determining whether a rational relationship

exists between the challenged law and a legitimate state interest." *Id.* at 222 (citing *Heller v. Doe*, 509 U.S. 312, 320, 113 S. Ct. 2637, 125 L. Ed. 2d 257 (1993)). In this respect, Ms. Fields misrepresents the standard articulated in *Wedges/Ledges of California, Inc. v. City of Phoenix, Ariz.*, 24 F.3d 56 (9th Cir. 1994), to the extent she suggests the Department bears the burden of producing facts showing that its rule bears a "substantial relationship to the public health, safety, morals, or general welfare." Pet. at 7, 9-10. Consistent with every case cited herein, the Court in *Wedges/Ledges* properly placed the burden on those challenging the city code provision to demonstrate that the provision was "clearly arbitrary and unreasonable, having no substantial relation to the public health, safety, morals, or general welfare." *Wedges/Ledges*, 24 F.3d at 65 (citations omitted).

Ms. Fields cannot meet her burden of demonstrating the absence of any rational relationship between the list of disqualifying crimes in WAC 170-06-0120(1) and the legitimate state interest in the safety and well-being of children in child care. Indeed, the great majority of disqualifying crimes listed in WAC 170-06-0120(1)—including second degree robbery—are identified in statute as "crimes against children or other persons." RCW 43.43.830(7). It is entirely rational for the Legislature to define those crimes as crimes against children or other

persons, and for the Department to disqualify persons convicted of such crimes from unsupervised access to children in child care. The Legislature has a legitimate state interest in prioritizing the safety of children over the right of any person to obtain employment in child care.[3]

Indeed, other state laws also prioritize the safety of children or vulnerable adults by categorically disqualifying individuals from specific kinds of employment if they have been convicted of certain crimes. For example, to qualify as a guardian in a case under RCW 11.88, a person must have no felony conviction of any kind, regardless of the crime or how long it has been since conviction. RCW 11.88.020(1)(c). Under regulations adopted by the Department of Social and Health Services, persons with certain convictions are barred from having unsupervised access to children or vulnerable adults receiving DSHS services. WAC 388-06A-0170; WAC 388-113-0020.

In addition, the Department of Early Learning receives substantial federal funding for child care programs in Washington. Federal law requires that states receiving funding for child care must require criminal

[3] In the Court of Appeals, Ms. Fields did not attempt to meet her burden, instead attempting to shift it to the Department by arguing that the Department had failed to produce specific evidence of a rational relationship. *See* Opening Brief of Appellant Christal Fields at 21-22. As explained above, she bears the burden of demonstrating unconstitutionality, and this Court "may assume the existence of any necessary state of facts which it can reasonably conceive in determining whether a rational relationship exists between the challenged law and a legitimate state interest." *Amunrud*, 158 Wn.2d at 222 (citing *Heller*, 509 U.S. at 320).

background checks of all child care staff members and must make them "ineligible for employment by a child care provider" if they have been convicted of certain listed felonies. 42 U.S.C. § 9858f(c)(1)(D). While the federal list is shorter than the lists in RCW 43.43.830(7) and WAC 170--06-0120(1), the principle is precisely the same: disqualifying child care workers based on certain classes of criminal convictions is rationally related to the legitimate public interest in ensuring the safety and well-being of children in child care. *See also* 42 U.S.C. § 9858f(h)(1) (explicitly allowing states to disqualify child care staff for convictions of crimes not on the federal list).

Ms. Fields' facial challenge also is undermined by her apparent concession that a permanent disqualification might be appropriate for some criminal convictions (like child rape, Pet. at 7), but not others. That concession admits there can be some criminal convictions that warrant permanent disqualification from child care work, leaving the burden on Ms. Fields to demonstrate why other criminal convictions have no rational relationship to the safety of children in child care. The burden is hers to demonstrate that the list in WAC 170-06-0120(1) lacks that rational relationship.

The only purported factual support Ms. Fields offers to show that the list of disqualifying crimes in WAC 170-06-0120(1) is not rationally

related to the safety of children in child care is her contention that she has presented "clear evidence of rehabilitation" following her conviction for attempted robbery. Pet. at 10. Even if that evidence were "clear"—which it is not, as summarized above at 2-3—it does not prove that the list is irrational or that it is irrational to refuse to accept any possible increased risk of harm to children in child care that may exist because an applicant for employment has a criminal history that includes conviction for a "crime against children or other persons." She has not met her burden of demonstrating that the use of a disqualifying list is irrational.

B. Ms. Fields Has Not Shown an As-Applied Violation of Due Process in This Case

Ms. Fields' as-applied due process challenge makes both substantive and procedural arguments. Substantively, she argues that even if the list of disqualifying crimes in WAC 170-06-0120 is rationally related to a legitimate state interest in the safety of children in child care, it should not apply to her because she has been rehabilitated. What she is really asking is for the Court to declare the rule substantively invalid, at least as applied to her, because it lacks a rehabilitation exception. Although she cites *Mathews v. Eldridge*, 424 U.S. 319, 335, 96 S. Ct. 893, 47 L. Ed. 2d 18 (1976), and uses the language of procedural due process, her actual argument is that the disqualification rule should be changed to

provide a hearing when an applicant asserts she has been rehabilitated. Pet. at 10-11. Her argument is not a procedural argument focused on ensuring that the law has been applied accurately to her; it is an effort to change the law.

There may be policy reasons for changing the law. Ms. Fields and the amici supporting her are free to pursue changes in the law by taking their arguments to the Legislature through normal political routes or to the Department in a petition for rulemaking. But just because a different law might be better policy or might be better tailored to some individuals does not make the challenged law irrational. Reduced to its essence, Ms. Fields' substantive argument is that even if the list in WAC 170-06-0120(1) is rationally related to a legitimate public interest, the United States Constitution requires more—she argues that it requires exceptions for applicants like her. Under rational basis review, her argument fails. A law that is rationally related to a legitimate public interest survives rational basis review and is constitutional—it does not become unconstitutional because a different law might be "more rational."

Procedurally, Ms. Fields argues that she is entitled to a meaningful hearing in which she can demonstrate her present ability to work safely with children in child care. She was given notice of the disqualification and provided a meaningful opportunity for an evidentiary hearing under

WAC 170-03 and the Administrative Procedure Act, RCW 34.05, to dispute the application of WAC 170-06-0120(1) to her. She had an opportunity to provide testimony and other evidence to support her initial claim that the criminal history the Department discovered was not hers, or to show that she had not been convicted of a disqualifying crime. CP 53-54. She was given a full and fair opportunity to demonstrate that the law was incorrectly applied to her. What she was not permitted to do in that hearing was to avoid the law by showing evidence of rehabilitation.

Consistent with *Amunrud*, this Court should reject Ms. Fields' contention that her hearing was not "meaningful" because she was not permitted to show rehabilitation. Procedural due process requires a meaningful opportunity to contest whether a law is being correctly applied; there is no procedural right to receive an exception not provided in law or to change the law. *Amunrud*, 158 Wn.2d at 218. Ms. Fields has not demonstrated a violation of procedural due process.

C. No Other Alleged Constitutional Violations Are Properly Before This Court

Both in the Court of Appeals and in support of Ms. Fields' Petition for Review to this Court, various amici curiae have attempted to raise additional constitutional arguments.[4] In apparent response to those

[4] Issues and claims raised only by amici should not be considered. *City of Seattle v. Evans*, 184 Wn.2d 856, 861 n.5, 366 P.3d 906 (2015), *cert. denied sub nom. Evans v.*

attempts by amici, Ms. Fields' Petition avoids identifying any specific constitutional violation in her statement of issues presented for review, instead asserting broadly that the appeal raises an unspecified "question of first impression" under the federal and state constitutions (Issue A) and that the challenged rules have "no rational relationship to child safety, and disproportionately affect[ ] women and people of color" (Issue B). Pet. at 2. Ms. Fields did not cite or argue the Washington Constitution in her briefing to the Court of Appeals, nor did she make any equal protection argument. Her belated token attempt (Pet. at 13-15) to do so now is improper and should be rejected. *See Dahl-Smyth, Inc. v. City of Walla Walla*, 148 Wn.2d 835, 839 n.5, 64 P.3d 15 (2003) (declining to address constitutional claim in the petition for review of a Court of Appeals decision where the claim had not been first presented to and decided by that court); *Douglas v. Freeman*, 117 Wn.2d 242, 257-58, 814 P.2d 1160 (1991) (refusing to consider a request that petitioner had not presented as a separate issue before the Court of Appeals or in the petition for review); *Pappas v. Hershberger*, 85 Wn.2d 152, 154, 530 P.2d 642 (1975) (dismissing petition for review as improvidently granted where, upon

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City of Seattle, 137 S. Ct. 474 (2016) (appellate court will not address arguments raised only by amicus). *Cummins v. Lewis County*, 156 Wn.2d 844, 850 n.4, 133 P.3d 458 (2006) (same). This is true even when a petitioner attempts to adopt the amicus argument in a supplemental filing. *Cummins*, 156 Wn.2d at 850-851.

reviewing the record, the Court found the issue stated in the petition for review had not been raised in the trial court or Court of Appeals).[5]

V. CONCLUSION

Ms. Fields has not demonstrated that WAC 170-06-0120 violates substantive or procedural due process. The rule is reasonably related to the safety and security of children in child care and thus survives rational basis review, whether challenged facially or as applied to her. This Court should affirm the decision of the Court of Appeals that upheld her disqualification from working with children in child care.

Respectfully submitted this 16th day of February 2018.

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[5] This rule is consistent with the Court's long-standing rule that it will not review a case on a theory different from that presented at the trial level. *See City of Tacoma v. William Rogers Co., Inc.*, 148 Wn.2d 169, 175 n.4, 60 P.3d 79 (2002); *Peoples Nat. Bank of Wash. v. Peterson*, 82 Wn.2d 822, 829-30, 514 P.2d 159 (1973) (citing cases).

CERTIFICATE OF SERVICE

I certify, under penalty of perjury under the laws of the state of Washington, that on this date I have caused a true and correct copy of the foregoing Notice of Appearance to be served via electronic mail on the following:

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DATED this 16th day of February 2018, at Olympia, Washington.

s/ Stephanie N. Lindey
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February 16, 2018 - 3:38 PM

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